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Attorneys for Defendant, Feit Electric Co., Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SEOUL SEMICONDUCTOR CO.,
LTD., a Korean corporation, SEOUL
VIOSYS CO., LTD., a Korean
corporation,

Plaintiff,

vs.

FEIT ELECTRIC CO., INC.,

Defendant.

CASE NO. 2:22-cv-05097-AB-SHK

Honorable Andre Birotte Jr.
Magistrate Shashi H. Kewalramani

**DECLARATION OF GREGORY C.
PROCTOR IN SUPPORT OF
DEFENDANT FEIT ELECTRIC'S
MOTION TO ENFORCE THE
COURT'S ORDER (DKT. 265) AND
FOR SANCTIONS**

FAC Filed: December 21, 2022

1 I, Gregory C. Proctor, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and
3 admitted to the United States District Court for the Central District of California.
4 I am an Attorney with the law firm Benesch, Friedlander, Coplan & Aronoff, LLP,
5 counsel of record for Defendant Feit Electric Co., Inc. I make this declaration of
6 my own personal knowledge, and if called as a witness in this action, I would and
7 could testify completely to the matters stated herein.

8 2. On September 26, 2024, I and co-counsel Salil Bali of Stradling Yocca
9 Carlson & Rauth, representing Defendant Feit Electric, and Kevin Kudlac,
10 representing Plaintiffs, met and conferred regarding Plaintiffs' September 5, 2024
11 Disclosure of Duplicative Bates Ranges Pursuant to Dkt. 265, during which Feit
12 Electric explained that Plaintiffs' disclosure failed to comply with Dkt. 265 by re-
13 producing information struck in that order. Plaintiffs' counsel responded that
14 Exhibit 1 to the disclosure was not meant to include a one-to-one overlap of
15 duplicate documents and that the Bates ranges for the June Production listed on
16 Exhibit 1 also included documents that Plaintiffs knew were not duplicates of
17 previously produced documents. Plaintiffs' counsel further committed to providing
18 an additional disclosure of Bates ranges of documents relating to products other
19 than the 51 accused products, but would not agree to withdraw Exhibit 1 from their
20 disclosure. Because the parties were unable to resolve their dispute, Feit Electric
21 requested a hearing before the Special Master.

22 3. Attached as Exhibit A are excerpts from a true and correct copy of the
23 transcript from the October 1, 2024, Conference Hearing in the above captioned
24 case.

25 4. Attached as Exhibit B is a true and correct copy of Plaintiffs'
26 Disclosure of Duplicative Bates Ranges Pursuant to Dkt. 265, dated September 5,
27 2024.

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1 5. Attached as Exhibit C is a true and correct copy of Exhibit 1 to
2 Plaintiffs' Disclosure of Duplicative Bates Ranges Pursuant to Dkt. 265.

3 6. Attached as Exhibit D is a true and correct copy of Exhibit 2 to
4 Plaintiffs' Disclosure of Duplicative Bates Ranges Pursuant to Dkt. 265.

5 7. Attached as Exhibit E is a true and correct copy of Exhibit 3 to
6 Plaintiffs' Disclosure of Duplicative Bates Ranges Pursuant to Dkt. 265.

7 8. Attached as Exhibit F is a true and correct copy of an email
8 correspondence thread between counsel for Defendant and Plaintiffs, with the
9 most recent email being dated September 19, 2024.

10 9. Attached as Exhibit G is a true and correct copy of an email
11 correspondence thread between counsel for Defendant and Plaintiffs, with the
12 most recent email being dated September 24, 2024.

13 10. Attached as Exhibit H is a true and correct copy of an email
14 correspondence thread between counsel for Defendant and Plaintiffs, with the
15 most recent email being dated September 25, 2024.

16 11. Attached as Exhibit I is a true and correct copy of an email
17 correspondence thread between counsel for Defendant and Special Master Olson,
18 with the most recent email being dated September 25, 2024.

19 12. Attached as Exhibit J is a true and correct copy of an email
20 correspondence thread between counsel for Defendant and Special Master Olson,
21 with the most recent email being dated September 26, 2024.

22 13. Attached as Exhibit K is a true and correct copy of Plaintiffs'
23 Amended Disclosure of Duplicative Bates Ranges Pursuant to Dkt. 265, dated
24 October 1, 2024.

25 14. Attached as Exhibit L is a true and correct copy of Exhibit 1 to
26 Plaintiffs' Amended Disclosure of Duplicative Bates Ranges Pursuant to Dkt. 265.

27 15. Attached as Exhibit M is a true and correct copy of Exhibit 2 to
28 Plaintiffs' Amended Disclosure of Duplicative Bates Ranges Pursuant to Dkt. 265.

1 16. Attached as Exhibit N is a true and correct copy of Exhibit 3 to
2 Plaintiffs' Amended Disclosure of Duplicative Bates Ranges Pursuant to Dkt. 265.

3 17. Attached as Exhibit O is a true and correct copy of Exhibit 4 to
4 Plaintiffs' Amended Disclosure of Duplicative Bates Ranges Pursuant to Dkt. 265.

5 18. Attached as Exhibit P is a true and correct copy of the document
6 bearing bates number SSC_FEIT00169517 and a screenshot capture of the
7 accompanying metadata as viewed through the Everlaw review platform.

8 19. Attached as Exhibit Q is a true and correct copy of the document
9 bearing bates number SSC_FEIT00038080 and a screenshot capture of the
10 accompanying metadata as viewed through the Everlaw review platform.

11 20. Attached as Exhibit R is a true and correct copy of the document
12 bearing bates number SSC_FEIT00179002 and a screenshot capture of the
13 accompanying metadata as viewed through the Everlaw review platform.

14 21. Attached as Exhibit S is a true and correct copy of the document
15 bearing bates number SSC_FEIT00171298 and a screenshot capture of the
16 accompanying metadata as viewed through the Everlaw review platform.

17 22. Attached as Exhibit T is a true and correct copy of the document
18 bearing bates number SSC_FEIT00058235 and a screenshot capture of the
19 accompanying metadata as viewed through the Everlaw review platform.

20 23. Attached as Exhibit U is a true and correct copy of the document
21 bearing bates number SSC_FEIT00069405 and a screenshot capture of the
22 accompanying metadata as viewed throughg the Everlaw review platform.

23 24. Attached as Exhibit V is a true and correct copy of the document
24 bearing bates number SSC_FEIT00184496 and a screenshot capture of the
25 accompanying metadata as viewed through the Everlaw review platform.

26 25. Attached as Exhibit W is a true and correct copy of an email
27 correspondence thread between counsel for Defendant and Special Master Olson,
28 with the most recent email being dated October 4, 2024.

1 26. Attached as Exhibit X is a true and correct copy of an email
2 correspondence thread between counsel for Defendant and Special Master Olson,
3 with the most recent email being dated October 7, 2024.

4 27. Attached as Exhibit Y are excerpts from a true and correct copy of the
5 transcript from the October 8, 2024, Hearing in the above captioned case.

6 28. Attached as Exhibit Z is a true and correct copy of an email
7 correspondence thread between counsel for Defendant and Plaintiffs, with the
8 most recent email being dated October 9, 2024.

9 29. Attached as Exhibit AA is a true and correct copy of an email
10 correspondence thread between counsel for Defendant and Plaintiffs, with the
11 most recent email being dated October 14, 2024.

12 30. Attached as Exhibit BB is a true and correct copy of an email
13 correspondence thread between counsel for Defendant and Plaintiffs, with the
14 most recent email being dated October 15, 2024.

15 31. Attached as Exhibit CC is a true and correct copy of an email
16 correspondence thread between counsel for Defendant and Plaintiffs, with the
17 most recent email being dated October 10, 2024.

18 32. Attached as Exhibit DD is a true and correct copy of an email
19 correspondence thread between counsel for Defendant and Plaintiffs, with the
20 most recent email being dated October 18, 2024.

21 33. Attached as Exhibit EE is a true and correct copy of an email
22 correspondence thread between counsel for Defendant and Plaintiffs, with the
23 most recent email being dated October 23, 2024.

24 34. Attached as Exhibit FF is a true and correct copy of an email
25 correspondence thread between counsel for Defendant and Plaintiffs, with the
26 most recent email being dated October 25, 2024.

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1 I declare under penalty of perjury under the laws of the State of California
2 and the United States of America that the foregoing is true and correct. Executed
3 this 25th day of October, 2024, in St. Petersburg, Florida.

4 /s/ Gregory C. Proctor

5 Gregory C. Proctor
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